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To: [Jeff Pomerantz](#); ["John A. Morris"](#); [Ira Kharasch](#); [Gregory V. Demo](#)
Cc: ["Michael Lynn"](#); [John Bonds](#); [John Wilson](#)
Subject: Highland Capital Management - Dondero's Production in Response to Debtor's Document Request
Date: Thursday, December 31, 2020 9:24:00 AM
Attachments: [Dondero Response to Debtor's First RFP 12.31.20.pdf](#)
[Dondero 000001 - 000108.pdf](#)

Counsel:

Attached please find (i) James Dondero's Objections and Responses to Debtor's First Request for Production; and (ii) documents responsive to Debtor's document requests, which are designated Dondero 000001 – 000108.

While Mr. Dondero believes that certain of the documents and communications responsive to the request and included in this production may be privileged or confidential, including under the Court's mediation order and Rule 408, he is producing them to ensure compliance with the Court's ruling of December 28 and to alleviate the need for the parties and the Court to incur additional time on these discovery requests.

Best,
Bryan

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